

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**In re TRANS UNION CORP.  
PRIVACY LITIGATION**

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**THIS DOCUMENT RELATES TO:**

**ALL CASES**

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**Lead Case No. 00 cv 4729  
MDL Docket No. 1350  
Judge Robert Gettleman  
Magistrate Judge Michael T.  
Mason**

To: Counsel of Record  
(as Shown on the Certificate of Service)

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that on Thursday, September 3, 2009 at 9:15 a.m., or as soon thereafter as counsel may be heard, the undersigned shall appear before the Honorable Robert W. Gettleman or before any judge sitting in his stead, in Courtroom 1703, in the Dirksen Building, 219 South Dearborn, Chicago, Illinois, to Present LIAISON COUNSEL'S APPLICATION FOR AN AWARD OF ATTORNEYS' FEES. A copy of the paper is being served upon you herewith.

DATED: August 27, 2009

By: /s/ Thomas A. Doyle

Terry Rose Saunders  
Thomas A. Doyle  
Saunders & Doyle  
20 South Clark Street, Suite 1720  
Chicago IL 60603  
Telephone: (312) 551-0051  
Fax: (312) 551-4467

Liaison Counsel for the Plaintiffs

- UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Special Master Feldman that they have no objection to an immediate award of \$550,000 to Liaison Counsel.

4. Liaison Counsel's total lodestar is \$612,827.50 and is explained in detail in Liaison Counsel's May 15, 2009 submission to the Court (Docket Entry #620), which included Liaison Counsel's daily time records (filed under seal). As set forth in the Declarations of Terry Rose Saunders and Thomas A. Doyle filed with the Court, Liaison Counsel has not included time spent on any fee petition or matter relating to the award of attorneys' fees in that lodestar calculation.

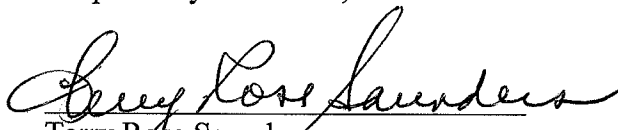
5. On August 5, 2009, the Order approving the Settlement became final pursuant to ¶1.43 of the Stipulation of Settlement ("Ultimate Approval"). Under ¶2.1(b)(ii) of the Stipulation of Settlement, attorneys' fees and expenses, to the extent awarded by the Court, are payable within ten days of Ultimate Approval.

6. A proposed order is attached.

WHEREFORE, Liaison Counsel respectfully requests that this Court award attorneys' fees in the amount of \$550,000.

August 27, 2009

Respectfully submitted,



Terry Rose Saunders

Thomas A. Doyle

SAUNDERS & DOYLE

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Chicago, IL 60603

Telephone: (312) 551-0051

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Liaison Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re TRANS UNION CORP. PRIVACY  
LITIGATION

) Lead Case No. 00 C 4729

) MDL Docket No. 1350

\_\_\_\_\_  
This Document Relates To:

) Judge Robert W. Gettleman

) Magistrate Judge Michael T. Mason

ALL ACTIONS.

**[PROPOSED] ORDER AWARDING ATTORNEYS' FEES TO LIAISON COUNSEL**

This matter having come before the Court on the application of Liaison Counsel for an award of attorneys' fees in the above-captioned action; the Court having considered all papers filed and proceedings conducted herein, having found the settlement of this action to be fair, reasonable and adequate, having received the recommendation of the Special Master and otherwise being fully informed in the premises and good cause appearing therefore;

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that:

1. This Court has jurisdiction over the subject matter of this application, all matters relating thereto and over the parties to this action, including all members of the Settlement Class.
2. The Court hereby awards attorneys' fees to Liaison Counsel in the amount of \$550,000. 00.
3. The awarded attorneys' fees shall be paid to Liaison Counsel subject to the terms, conditions and obligations of the Stipulation of Settlement approved by the Court on September

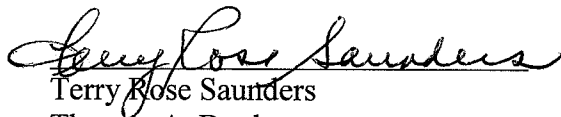
17, 2008, and in particular ¶4.2 thereof, which terms, conditions and obligations are incorporated herein.

IT IS SO ORDERED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
THE HONORABLE ROBERT W. GETTLEMAN  
UNITED STATES DISTRICT JUDGE

Submitted by:

  
Terry Rose Saunders

Thomas A. Doyle

SAUNDERS & DOYLE

20 South Clark Street, Suite 1720

Chicago, IL 60603

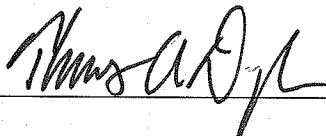
Telephone: (312) 551-0051

Fax: (312) 551-4467

Liaison Counsel for Plaintiffs

**CERTIFICATE OF SERVICE**

I certify that on August 27, 2009, I caused a copy of the foregoing document to be served upon Counsel of Record via the Court's Electronic Case Filing system.

A handwritten signature in dark ink, appearing to read "Thomas A. Doyle", is written over a horizontal line.

Thomas A. Doyle